

1 Doreen Spears Hartwell, Esq.
2 Nevada State Bar No. 7525
3 Laura Thalacker, Esq.
4 Nevada State Bar No. 5522
5 HARTWELL THALACKER, LTD
6 11920 Southern Highlands Pkwy, Suite 201
7 Las Vegas, Nevada 89141
8 Phone: (702) 850-1074; Fax: (702) 508-9551
9 doreen@HartwellThalacker.com
10 laura@HartwellThalacker.com
11 Attorneys for Defendants
12 OTIS ELEVATOR COMPANY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

10 BRODERICK SINCLAIR, individually,
11 Plaintiff,
12 vs.
13 OTIS WORLDWIDE CORPORATION,
14 OTIS ELEVATOR COMPANY, ROBERT
15 LINDLEY, STEVE BERGER, ZACHARY
16 CHRISTIANSEN, STEVEN SPERB, KEVIN
17 HANSON, JANE NGUYEN, AND PAUL
HENTZ; DOES I through X; and ROE
CORPORATIONS I through X, inclusive,
Defendants.

Case No.: 2:22-cv-02065-GMN-EJY

**DEFENDANT ZACHARY
CHRISTIANSEN'S UNOPPOSED
MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE
PLEAD**

(FIRST REQUEST)

Defendant Zachary Christiansen (“Christiansen”), by and through his attorneys, and pursuant to LR IA 6-1, respectfully moves this Court to extend the deadline for him to answer or otherwise respond to Plaintiff’s complaint until March 6, 2023. In support of this motion, Christiansen states as follows:

25 1. Plaintiff filed his Complaint in the District of Nevada on December 13, 2022.

26 2. Christiansen was served on January 25, 2023, and his response is currently due on

27 February 15, 2023.

1 3. Christiansen and his counsel require additional time in which to investigate the
2 claims and prepare his response to the Complaint.

3 4. Christiansen's counsel contacted opposing counsel on February 1, 2023 to request
4 an extension of time for Christiansen to answer or otherwise respond to the Complaint. Plaintiff
5 does not object to this extension.

6 5. This is Christiansen's first request for an extension of time to answer or otherwise
7 respond to Plaintiff's complaint.

8 6. This request is made in good faith and not for the purposes of unwarranted delay
9 or for any other improper purpose.

10 *****REMAINDER OF PAGE INTENTIONALLY LEFT BLANK*****

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2 WHEREFORE, for the foregoing reasons, Christiansen respectfully requests that the Court
3 enter an order granting Christiansen an extension of time until March 6, 2023, in which to answer
4 or otherwise respond to Plaintiff's Complaint.

5
6 Dated: February 13, 2023

7 Respectfully Submitted,

8
9 /s/Doreen Spears Hartwell
10 Doreen Spears Hartwell
Hartwell Thalacker, LTD

11
12 *Attorneys for Defendant*
ZACHARY CHRISTIANSEN

13
14 IT IS SO ORDERED that Defendant Zachary
15 Christiansen's Unopposed Motion to Extend
16 Time to Answer or Otherwise Plead (ECF
17 No. 42) is GRANTED.

18 IT IS FURTHER ORDERED that Defendant
19 Zachary Christiansen's Unopposed Motion to
Extend Time to Answer or Otherwise Plead
(ECF No. 41) is DENIED as moot.

20
21 
22 ELAYNA J. YOUCAH
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: February 14, 2023